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| Attorney or Party Name, Address, Telephone & FAX Nos., State Bar No. & Email Address Michael Gerard Fletcher (State Bar No. 70849) mfletcher@frandzel.com Paige S. Poupart (State Bar No. 343547) ppoupart@frandzel.com FRANDZEL ROBINS BLOOM & CSATO, L.C. 1000 Wilshire Boulevard, 19th Floor Los Angeles, CA 90017-2427 Telephone: (323) 852-1000 Fax: (323) 651-2577 <input type="checkbox"/> <i>Movant appearing without an attorney</i> <input checked="" type="checkbox"/> <i>Attorney for Movant</i> | FOR COURT USE ONLY |
| UNITED STATES BANKRUPTCY COURT CENTRAL DISTRICT OF CALIFORNIA – LOS ANGELES DIVISION | |
| In re SEATON INVESTMENTS, LLC, <i>et al.</i> , Debtors and Debtors-in-Possession. Affects: <input type="checkbox"/> All Debtors <input type="checkbox"/> Seaton Investments, LLC <input type="checkbox"/> Colyton Investments, LLC <input checked="" type="checkbox"/> Broadway Avenue Investments, LLC <input type="checkbox"/> SLA Investments, LLC <input type="checkbox"/> Negev Investments, LLC <input type="checkbox"/> Alan Gomperts <input type="checkbox"/> Daniel Halevy <input type="checkbox"/> Susan Halevy Debtor(s). | LEAD CASE NO.: 2:24-bk-12079-VZ CHAPTER: 11 Jointly Administered with Case Nos.: 2:24-bk-12080-VZ; 2:24-bk-12081-VZ; 2:24-bk-12082-VZ; 2:24-bk-12091-VZ; 2:24-bk-12074-VZ; 2:24-bk-12075-VZ; and 2:24-bk-12076-VZ NOTICE OF MOTION AND MOTION FOR RELIEF FROM THE AUTOMATIC STAY UNDER 11 U.S.C. § 362 (with supporting declarations) (REAL PROPERTY) DATE: October 29, 2024 TIME: 10:30 a.m. COURTROOM: 1368 |
| Movant: Archway Broadway Loan SPE, LLC, fka Archway Real Estate Income Fund I REIT, LLC | |

1. **Hearing Location:**

- | | |
|---|--|
| <input checked="" type="checkbox"/> 255 East Temple Street, Los Angeles, CA 90012 | <input type="checkbox"/> 411 West Fourth Street, Santa Ana, CA 92701 |
| <input type="checkbox"/> 21041 Burbank Boulevard, Woodland Hills, CA 91367 | <input type="checkbox"/> 1415 State Street, Santa Barbara, CA 93101 |
| <input type="checkbox"/> 3420 Twelfth Street, Riverside, CA 92501 | |

2. Notice is given to the Debtor and trustee (*if any*)(Responding Parties), their attorneys (*if any*), and other interested parties that on the date and time and in the courtroom stated above, Movant will request that this court enter an order granting relief from the automatic stay as to Debtor and Debtor's bankruptcy estate on the grounds set forth in the attached Motion.
3. To file a response to the motion, you may obtain an approved court form at www.cacb.uscourts.gov/forms for use in preparing your response (optional LBR form F 4001-1 .RFS.RESPONSE), or you may prepare your response using the format required by LBR 9004-1 and the Court Manual.

4. When serving a response to the motion, serve a copy of it upon the Movant's attorney (or upon Movant, if the motion was filed by an unrepresented individual) at the address set forth above.
5. If you fail to timely file and serve a written response to the motion, or fail to appear at the hearing, the court may deem such failure as consent to granting of the motion.
6. ☒ This motion is being heard on REGULAR NOTICE pursuant to LBR 9013-1 (d). If you wish to oppose this motion, you must file and serve a written response to this motion no later than 14 days before the hearing and appear at the hearing.
7. ☐ This motion is being heard on SHORTENED NOTICE pursuant to LBR 9075-1(b). If you wish to oppose this motion, you must file and serve a response no later than *(date)* _and *(time)* _; and, you may appear at the hearing.
- a. ☐ An application for order setting hearing on shortened notice was not required (according to the calendaring procedures of the assigned judge).
- b. ☐ An application for order setting hearing on shortened notice was filed and was granted by the court and such motion and order have been or are being served upon the Debtor and upon the trustee (if any).
- c. ☐ An application for order setting hearing on shortened notice was filed and remains pending. After the court rules on that application, you will be served with another notice or an order that specifies the date, time and place of the hearing on the attached motion and the deadline for filing and serving a written opposition to the motion.

Date: October 8, 2024

FRANDZEL ROBINS BLOOM & CSATO, L.C.
Printed name of law firm (if applicable)

Michael Gerard Fletcher
Printed name of individual Movant or attorney for Movant

/s/ Michael Gerard Fletcher
Signature of individual Movant or attorney for Movant

MOTION FOR RELIEF FROM THE AUTOMATIC STAY AS TO REAL PROPERTY

1. **Movant is the:**

- ☒ Holder: Movant has physical possession of a promissory note that either (1) names Movant as the payee under the promissory note or (2) is indorsed to Movant, or indorsed in blank, or payable to bearer.
- ☒ Beneficiary: Movant is either (1) named as beneficiary in the security instrument on the subject property (e.g., mortgage or deed of trust) or (2) is the assignee of the beneficiary.
- ☐ Servicing agent authorized to act on behalf of the Holder or Beneficiary.
- ☐ Other (*specify*):

2. **The Property at Issue (Property):**

- a. Address: 737 South Broadway

Street address:

Unit/suite number:

City, state, zip code: Los Angeles, CA 90014

- b. Legal description, or document recording number (including county of recording):

See Continuation Page.

3. **Bankruptcy Case History:**

- a. A ☒ voluntary ☐ involuntary bankruptcy petition under chapter ☐ 7 ☒ 11 ☐ 12 ☐ 13 was filed on (*date*) 3/19/2024.
- b. ☐ An order to convert this case to chapter ☐ 7 ☐ 11 ☐ 12 ☐ 13 was entered on (*date*) .
- c. ☐ A plan, if any, was confirmed on (*date*) .

4. **Grounds for Relief from Stay:**

- a. ☒ Pursuant to 11 U.S.C. § 362(d)(1), cause exists to grant Movant relief from stay as follows:
- (1) ☒ Movant's interest in the Property is not adequately protected.
- (A) ☒ Movant's interest in the Property is not protected by an adequate equity cushion.
- (B) ☒ The fair market value of the Property is declining and payments are not being made to Movant sufficient to protect Movant's interest against that decline.
- (C) ☐ Proof of insurance regarding the Property has not been provided to Movant, despite the Debtor's obligation to insure the collateral under the terms of Movant's contract with the Debtor.
- (2) ☒ The bankruptcy case was filed in bad faith.
- (A) ☐ Movant is the only creditor, or one of very few creditors, listed or scheduled in the Debtor's case commencement documents.
- (B) ☐ The Property was transferred to the Debtor either just before the bankruptcy filing or after the filing.
- (C) ☐ A non-individual entity was created just prior to the bankruptcy petition date for the sole purpose of filing this bankruptcy case.
- (D) ☐ Other bankruptcy cases have been filed in which an interest in the Property was asserted.
- (E) ☐ The Debtor filed only a few case commencement documents with the bankruptcy petition. Schedules and the statement of financial affairs (or chapter 13 plan, if appropriate) have not been filed.
- (F) ☒ Other (*see attached continuation page*).

- (3) ☐ (*Chapter 12 or 13 cases only*)
- (A) ☐ All payments on account of the Property are being made through the plan.
- ☐ Preconfirmation ☐ Postconfirmation plan payments have not been made to the chapter 12 trustee or chapter 13 trustee.
- (B) ☐ Postpetition mortgage payments due on the note secured by a deed of trust on the Property have not been made to Movant.
- (4) ☐ The Debtor filed a Statement of Intentions that indicates the Debtor intends to surrender the Property.
- (5) ☐ The Movant regained possession of the Property on (*date*) _____,
which is ☐ prepetition ☐ postpetition.
- (6) ☐ For other cause for relief from stay, see attached continuation page.
- b. ☒ Pursuant to 11 U.S.C. § 362(d)(2)(A), the Debtor has no equity in the Property; and, pursuant to § 362(d)(2)(B), the Property is not necessary to an effective reorganization.
- c. ☒ Pursuant to 11 U.S.C. § 362(d)(3), the Debtor has failed, within the later of 90 days after the order for relief or 30 days after the court determined that the Property qualifies as "single asset real estate" as defined in 11 U.S.C. § 101(51B) to file a reasonable plan of reorganization or to commence monthly payments.
- d. ☐ Pursuant to 11 U.S.C. § 362(d)(4), the Debtor's filing of the bankruptcy petition was part of a scheme to delay, hinder, or defraud creditors that involved:
- (1) ☐ The transfer of all or part ownership of, or other interest in, the Property without the consent of Movant or court approval; or
- (2) ☐ Multiple bankruptcy cases affecting the Property.
5. ☐ **Grounds for Annulment of the Stay.** Movant took postpetition actions against the Property or the Debtor.
- a. ☐ These actions were taken before Movant knew the bankruptcy case had been filed, and Movant would have been entitled to relief from the stay to proceed with these actions.
- b. ☐ Movant knew the bankruptcy case had been filed, but Movant previously obtained relief from stay to proceed with these enforcement actions in prior bankruptcy cases affecting the Property as set forth in Exhibit ____.
- c. ☐ Other (*specify*):
6. **Evidence in Support of Motion: (*Declaration(s) MUST be signed under penalty of perjury and attached to this motion*)**
- a. The REAL PROPERTY DECLARATION on page 6 of this motion.
- b. ☒ Supplemental declaration(s).
- c. ☒ The statements made by Debtor under penalty of perjury concerning Movant's claims and the Property as set forth in Debtor's case commencement documents. Authenticated copies of the relevant portions of the case commencement documents are attached to the Declaration of Paige S. Poupart ("Poupart Declaration") as Exhibits 22, 23.
- d. ☐ Other:
7. ☒ **An optional Memorandum of Points and Authorities is attached to this motion.**

Movant requests the following relief:

1. Relief from the stay is granted under: ☒ 11 U.S.C. § 362(d)(1) ☒ 11 U.S.C. § 362(d)(2) ☒ 11 U.S.C. § 362(d)(3).
2. ☒ Movant (and any successors or assigns) may proceed under applicable nonbankruptcy law to enforce its remedies to foreclose upon and obtain possession of the Property.
3. ☐ Movant, or its agents, may, at its option, offer, provide and enter into a potential forbearance agreement, loan modification, refinance agreement or other loan workout or loss mitigation agreement. Movant, through its servicing agent, may contact the Debtor by telephone or written correspondence to offer such an agreement. Any such agreement shall be nonrecourse unless stated in a reaffirmation agreement.
3. ☐ Confirmation that there is no stay in effect.
4. ☐ The stay is annulled retroactive to the bankruptcy petition date. Any postpetition actions taken by Movant to enforce its remedies regarding the Property shall not constitute a violation of the stay.
5. ☐ The co-debtor stay of 11 U.S.C. § 1201(a) or § 1301(a) is terminated, modified or annulled as to the co-debtor, on the same terms and conditions as to the Debtor.
6. ☒ The 14-day stay prescribed by FRBP 4001(a)(3) is waived.
7. ☐ A designated law enforcement officer may evict the Debtor and any other occupant from the Property regardless of any future bankruptcy filing concerning the Property for a period of 180 days from the hearing on this Motion:
☐ without further notice, or ☐ upon recording of a copy of this order or giving appropriate notice of its entry in compliance with applicable nonbankruptcy law.
8. ☐ Relief from the stay is granted under 11 U.S.C. § 362(d)(4): If recorded in compliance with applicable state laws governing notices of interests or liens in real property, the order is binding in any other case under this title purporting to affect the Property filed not later than 2 years after the date of the entry of the order by the court, except that a debtor in a subsequent case under this title may move for relief from the order based upon changed circumstances or for good cause shown, after notice and hearing.
9. ☐ The order is binding and effective in any bankruptcy case commenced by or against any debtor who claims any interest in the Property for a period of 180 days from the hearing of this Motion:
☐ without further notice, or ☐ upon recording of a copy of this order or giving appropriate notice of its entry in compliance with applicable nonbankruptcy law.
10. ☐ The order is binding and effective in any future bankruptcy case, no matter who the debtor may be:
☐ without further notice, or ☐ upon recording of a copy of this order or giving appropriate notice of its entry in compliance with applicable nonbankruptcy law.
11. ☐ Upon entry of the order, for purposes of Cal. Civ. Code § 2923.5, the Debtor is a borrower as defined in Cal. Civ. Code § 2920.5(c)(2)(C).
12. ☒ If relief from stay is not granted, adequate protection shall be ordered.
13. ☐ See attached continuation page for other relief requested.

Date: October 8, 2024

FRANDZEL ROBINS BLOOM & CSATO, L.C.
Printed name of law firm (if applicable)
Michael Gerard Fletcher
Printed name of individual Movant or attorney for Movant
/s/ Michael Gerard Fletcher
Signature of individual Movant or attorney for Movant

CONTINUATION PAGE

2.a. Legal Description of real property located at 737 South Broadway, Los Angeles, CA 90014:

EXHIBIT A

LEGAL DESCRIPTION OF LAND

THE LAND REFERRED TO IS SITUATED IN THE COUNTY OF LOS ANGELES, CITY OF LOS ANGELES, STATE OF CALIFORNIA, AND IS DESCRIBED AS FOLLOWS:

THAT PORTION OF BLOCK 25 OF THE HUBER TRACT, IN THE CITY OF LOS ANGELES, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 2, PAGE 280 OF MISCELLANEOUS RECORDS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY, DESCRIBED AS FOLLOWS:

BEGINNING AT THE INTERSECTION OF THE NORTHWESTERLY LINE OF BROADWAY, 80 FEET WIDE, WITH THE DIVIDING LINE ESTABLISHED BY AGREEMENT AND DEED BETWEEN THE LOS ANGELES TRUST COMPANY AND NIAGARA BUILDING COMPANY, RECORDED DECEMBER 11, 1908 IN BOOK 3568, PAGE 93 OF DEEDS, RECORDS OF SAID COUNTY, SAID INTERSECTION BEING DISTANT NORTH 37° 48' EAST ALONG SAID NORTHWESTERLY LINE, 180.47 FEET, MORE OR LESS, FROM THE NORTHERLY LINE OF 8TH STREET, 60 FEET WIDE, AS SHOWN ON MAP OF A RESUBDIVISION OF A PORTION OF BLOCK 25, HUBER TRACT, RECORDED IN BOOK 5, PAGE 15 OF MAPS, IN THE OFFICE OF SAID COUNTY RECORDER; THENCE NORTH 37° 48' EAST ALONG SAID NORTHWESTERLY LINE, 60 FEET, MORE OR LESS, TO THE MOST EASTERLY CORNER OF LOT 4 IN SAID BLOCK 25 OF HUBER TRACT; THENCE NORTH 52° 12' WEST ALONG THE NORTHEASTERLY LINE OF SAID LOT 4, A DISTANCE OF 165 FEET, MORE OR LESS, TO THE MOST NORTHERLY CORNER OF SAID LOT 4; THENCE SOUTH 37° 48' WEST ALONG THE NORTHWESTERLY LINE OF SAID LOT 4 AND OF LOT 3 OF BLOCK 25 OF SAID HUBER TRACT, 60 FEET, MORE OR LESS, TO SAID DIVIDING LINE; THENCE SOUTH 52° 12' EAST, ALONG SAID DIVIDING LINE, 165 FEET, MORE OR LESS, TO THE POINT OF BEGINNING.

APN: 5144-014-030

- 4.a.(2)(F) The bankruptcy case was filed in bad faith because such filing was done as part of a scheme to shield guarantors' significant net worths, while shifting the risk of Broadway's failure onto Archway. Broadway's manager, Mr. Alan Gomperts, refused to make a mandatory capital call on Broadway's members—themselves debtors and Archway obligors—while Broadway was insolvent and while these same members had combined net worths of over \$60 million per personal financial statements they provided to Archway in August 2023. At around the same time, Mr. Gomperts and Ms. Susan Halevy began transferring multi-million-dollar properties to newly-created/revived non-debtor LLCs. Ms. Halevy transferred the Canon Drive Property to Cannon Drive LLC and then Mr. Daniel Halevy then obtained a \$1.3 million loan secured by a deed of trust on the Canon Drive Property. This was just two months prior to Archway's loan maturing, and only a few more months before these jointly-administered bankruptcy petitions were filed.

REAL PROPERTY DECLARATION

I, (print name of Declarant) Bobby Khorshidi, declare:

1. I have personal knowledge of the matters set forth in this declaration and, if called upon to testify, I could and would competently testify thereto. I am over 18 years of age. I have knowledge regarding Movant's interest in the real property that is the subject of this Motion (Property) because (*specify*):
 - a. ☐ I am the Movant.
 - b. ☒ I am employed by Movant as (*state title and capacity*): I am a director of Archway Real Estate Income Fund I REIT, LLC fka Archway Real Estate Income Fund I SPE I, LLC, a Delaware limited liability company, who is a manager of secured creditor, Archway Broadway Loan SPE, LLC, a Delaware limited liability company ("Archway" or "Movant").
 - c. ☐ Other (*specify*): I am counsel to the Movant.
2.
 - a. ☒ I am one of the custodians of the books, records and files of Movant that pertain to loans and extensions of credit given to Debtor concerning the Property. I have personally worked on the books, records and files, and as to the following facts, I know them to be true of my own knowledge or I have gained knowledge of them from the business records of Movant on behalf of Movant. These books, records and files were made at or about the time of the events recorded, and which are maintained in the ordinary course of Movant's business at or near the time of the actions, conditions or events to which they relate. Any such document was prepared in the ordinary course of business of Movant by a person who had personal knowledge of the event being recorded and had or has a business duty to record accurately such event. The business records are available for inspection and copies can be submitted to the court if required.
 - b. ☐ Other (*see attached*):
3. The Movant is:
 - a. ☒ Holder: Movant has physical possession of a promissory note that (1) names Movant as the payee under the promissory note or (2) is indorsed to Movant, or indorsed in blank, or payable to bearer. A true and correct copy of the note, with affixed allonges/indorsements, is attached to the concurrently-filed Supplemental Declaration of Bobby Khorshidi ("Supplemental Khorshidi Declaration") as Exhibits 1; 10.
 - b. ☒ Beneficiary: Movant is either (1) named as beneficiary in the security instrument on the subject property (e.g. ,mortgage or deed of trust) or (2) is the assignee of the beneficiary. True and correct copies of the recorded security instrument and assignments are attached to the Supplemental Khorshidi Declaration as Exhibits 2; 10.
 - c. ☐ Servicing agent authorized to act on behalf of the:
 - ☐ Holder.
 - ☐ Beneficiary.
 - d. ☐ Other (*specify*):
4.
 - a. The address of the Property is:

Street address: 737 South Broadway
Unit/suite no.:
City, state, zip code: Los Angeles, CA 90014
 - b. The legal description of the Property or document recording number (including county of recording) set forth in the Movant's deed of trust is:

See continuation page.

5. Type of property (*check all applicable boxes*):

- a. ☐ Debtor's principal residence
b. ☐ Other residence
c. ☐ Multi-unit residential
d. ☒ Commercial
e. ☐ Industrial
f. ☐ Vacant land
g. ☐ Other (*specify*):

6. Nature of the Debtor's interest in the Property:

- a. ☒ Sole owner
b. ☐ Co-owner(s) (*specify*):
c. ☐ Lienholder (*specify*):
d. ☐ Other (*specify*):
e. ☒ The Debtor ☒ did ☐ did not list the Property in the Debtor's schedules.
f. ☐ The Debtor acquired the interest in the Property by ☐ grant deed ☐ quitclaim deed ☐ trust deed.
The deed was recorded on (*date*) .

7. Movant holds a ☒ deed of trust ☐ judgment lien ☐ other (*specify*) _____ that encumbers the Property.

- a. ☒ A true and correct copy of the document as recorded is attached to the Supplemental Khorshidi Declaration as Exhibit 2.
b. ☒ A true and correct copy of the promissory note or other document that evidences the Movant's claim is attached to the Supplemental Khorshidi Declaration as Exhibit 1.
c. ☒ A true and correct copy of the assignment(s) transferring the beneficial interest under the note and deed of trust to Movant is attached to the Supplemental Khorshidi Declaration as Exhibit 10.

8. Amount of Movant's claim with respect to the Property:

| | PREPETITION | POSTPETITION | TOTAL |
|---|------------------|-----------------|------------------|
| a. Principal: | \$ 15,241,093.00 | \$ | \$ 15,241,093.00 |
| b. Accrued interest: | \$ 838,260.12 | \$ 1,501,247.66 | \$ 2,339,507.78 |
| c. Late charges | \$ | \$ | \$ |
| d. Costs | \$ | \$ | \$ |
| e. Advances (property taxes, insurance, <u>attorney fees and costs</u>): | \$ 82,690.68 | \$ 442,657.54 | \$ 525,348.22 |
| f. Less suspense account or partial balance paid: | \$[] | \$[] | \$[] |
| g. TOTAL CLAIM as of (<i>date</i>): 9/23/2024 | \$ 16,162,043.80 | \$ 1,943,905.20 | \$ 18,105,949.00 |

December 1,

- h. ☒ Loan is all due and payable because it matured on (*date*) 2023

9. Status of Movant's foreclosure actions relating to the Property (*fill the date or check the box confirming no such action has occurred*):

- a. Notice of default recorded on (*date*) _____ or ☒ none recorded.
b. Notice of sale recorded on (*date*) _____ or ☒ none recorded.
c. Foreclosure sale originally scheduled for (*date*) _____ or ☒ none scheduled.
d. Foreclosure sale currently scheduled for (*date*) _____ or ☒ none scheduled.
e. Foreclosure sale already held on (*date*) _____ or ☒ none held.
f. Trustee's deed upon sale already recorded on (*date*) _____ or ☒ none recorded.

10. Attached (*optional*) as is a true and correct copy of a POSTPETITION statement of account that accurately reflects the dates and amounts of all charges assessed to and payments made by the Debtor since the bankruptcy petition date.

11. ☒ (*chapter 7 and 11 cases only*) Status of Movant's loan:

a. Amount of current monthly payment as of the date of this declaration: \$ N/A (fully-matured) for the month of 20.

b. Number of payments that have come due and were not made: . Total amount: \$

c. Future payments due by time of anticipated hearing date (*if applicable*):

An additional payment of \$ will come due on (*date*) , and on the day of each month thereafter. If the payment is not received within days of said due date, a late charge of \$ will be charged to the loan.

d. The fair market value of the Property is \$ 11,500,000.00, established by:

(1) ☐ An appraiser's declaration with appraisal is attached as Exhibit .

(2) ☐ A real estate broker or other expert's declaration regarding value is attached as Exhibit .

(3) ☒ A true and correct copy of relevant portion(s) of the Debtor's schedules is attached to the Declaration of Paige S. Poupart ("Poupart Declaration") as Exhibit 23.

(4) ☐ Other (*specify*):

e. **Calculation of equity/equity cushion in Property:**

Based upon ☐ a preliminary title report ☒ the Debtor's admissions in the schedules filed in this case, the Property is subject to the following deed(s) of trust or lien(s) in the amounts specified securing the debt against the Property:

| | Name of Holder | Amount as Scheduled by Debtor (<i>if any</i>) | Amount known to Declarant and Source |
|-------------------------------------|----------------------------------|--|---|
| 1st deed of trust: | Archway Broadway Loan SPE, LLC | \$ 15,241,093.00 | \$ 18,105,949.00 (Supplemental Khorshidi Decl. ¶ 21) |
| 2nd deed of trust: | | \$ | \$ |
| 3rd deed of trust: | | \$ | \$ |
| 4th deed of trust: | | \$ | \$ |
| Judgment liens: | | \$ | \$ |
| Taxes: | Los Angeles County Tax Collector | \$ 44,997.00 | \$ 44,997.00 (Poupart Decl., Exh. 23 Debtor's Schedule D) |
| Other: | | \$ | \$ |
| TOTAL DEBT: \$ 18,150,946.00 | | | |

f. Evidence establishing the existence of these deed(s) of trust and lien(s) is attached as Exhibit 2 to the Supplemental Khorshidi Declaration and Exhibit 23 to the Poupart Declaration consists of:

(1) ☐ Preliminary title report.

(2) ☒ Relevant portions of the Debtor's schedules.

(3) ☒ Other (*specify*): Recorded Deed of Trust in favor of Movant as beneficiary (Khorshidi Decl. Exh. 2)

g. ☒ **11 U.S.C. § 362(d)(1) - Equity Cushion:**

I calculate that the value of the "equity cushion" in the Property exceeding Movant's debt and any lien(s) senior to Movant's debt is \$ 0.00 and is 0% of the fair market value of the Property.

h. ☒ **11 U.S.C. § 362(d)(2)(A) - Equity:**

By subtracting the total amount of all liens on the Property from the value of the Property as set forth in Paragraph 11(e) above, I calculate that the Debtor's equity in the Property is \$0.00.

- i. ☒ Estimated costs of sale: \$805,000.00 (estimate based upon _____ % of estimated gross sales price)
- j. ☒ The fair market value of the Property is declining because: postpetition interest and ad valorem real property taxes are not being paid; plus the Property sits vacant without proper maintenance and security and having failed to qualify for an occupancy certificate from the City of Los Angeles.

12. ☐ (Chapter 12 and 13 cases only) Status of Movant's loan and other bankruptcy case information:

- a. A 341(a) meeting of creditors is currently scheduled for (or concluded on) the following date: _____.
A plan confirmation hearing currently scheduled for (or concluded on) the following date: _____.
A plan was confirmed on the following date (if applicable): _____.

- b. Postpetition preconfirmation payments due BUT REMAINING UNPAID since the filing of the case:

| Number of Payments | Number of Late Charges | Amount of Each Payment or Late Charge | Total |
|--------------------|------------------------|---------------------------------------|-------|
| | | \$ | \$ |
| | | \$ | \$ |
| | | \$ | \$ |
| | | \$ | \$ |
| | | \$ | \$ |
| | | \$ | \$ |
| | | \$ | \$ |
| | | \$ | \$ |

(See attachment for additional breakdown of information attached as Exhibit _____.)

- c. Postpetition postconfirmation payments due BUT REMAINING UNPAID since the filing of the case:

| Number of Payments | Number of Late Charges | Amount of each Payment or Late Charge | Total |
|--------------------|------------------------|---------------------------------------|-------|
| | | \$ | \$ |
| | | \$ | \$ |
| | | \$ | \$ |
| | | \$ | \$ |
| | | \$ | \$ |
| | | \$ | \$ |
| | | \$ | \$ |
| | | \$ | \$ |

- d. Postpetition advances or other charges due but unpaid: \$
(For details of type and amount, see Exhibit _____)
- e. Attorneys' fees and costs: \$
(For details of type and amount, see Exhibit _____)
- f. Less suspense account or partial paid balance: \$[]
- TOTAL POSTPETITION DELINQUENCY: \$

- g. Future payments due by time of anticipated hearing date (if applicable): _____.
An additional payment of \$ _____ will come due on _____, and on the _____ day of each month thereafter. If the payment is not received by the _____ day of the month, a late charge of \$ _____ will be charged to the loan.
- h. Amount and date of the last 3 postpetition payments received from the Debtor in good funds, regardless of how applied (if applicable):
\$ _____ received on (date) _____
\$ _____ received on (date) _____
\$ _____ received on (date) _____
- i. ☐ The entire claim is provided for in the chapter 12 or 13 plan and postpetition plan payments are delinquent. A plan payment history is attached as Exhibit _____. See attached declaration(s) of chapter 12 trustee or 13 trustee regarding receipt of payments under the plan (attach LBR form F 4001-1.DEC. AGENT. TRUSTEE)

13. ☐ Proof of insurance regarding the Property has not been provided to Movant, despite the Debtor's obligation to insure the collateral under the terms of Movant's contract with the Debtor.
14. ☒ The court determined on (date) 3/19/2024¹ that the Property qualifies as "single asset real estate" as defined in 11 U.S.C. § 101(51B). More than 90 days have passed since the filing of the bankruptcy petition; more than 30 days have passed since the court determined that the Property qualifies as single asset real estate; the Debtor has not filed a plan of reorganization that has a reasonable possibility of being confirmed within a reasonable time; or the Debtor has not commenced monthly payments to Movant as required by 11 U.S.C. § 362(d)(3).
15. ☐ The Debtor's intent is to surrender the Property. A true and correct copy of the Debtor's statement of intentions is attached as Exhibit ____.
16. ☐ Movant regained possession of the Property on (date) _____, which is ☐ prepetition ☐ postpetition.
17. ☒ The bankruptcy case was filed in bad faith:
- a. ☐ Movant is the only creditor or one of few creditors listed in the Debtor's case commencement documents.
 - b. ☐ Other bankruptcy cases have been filed in which an interest in the Property was asserted.
 - c. ☐ The Debtor filed only a few case commencement documents. Schedules and a statement of financial affairs (or chapter 13 plan, if appropriate) have not been filed.
 - d. ☒ Other (specify): See Supplemental Khorshidi Declaration; Poupart Declaration; Declaration of Michael Gerard Fletcher.
18. ☐ The filing of the bankruptcy petition was part of a scheme to delay, hinder, or defraud creditors that involved:
- a. ☐ The transfer of all or part ownership of, or other interest in, the Property without the consent of Movant or court approval. See attached continuation page for facts establishing the scheme.
 - b. ☐ Multiple bankruptcy cases affecting the Property include:
 - 1. Case name: _____
Chapter: _____ Case number: _____
Date filed: _____ Date discharged: _____ Date dismissed: _____
Relief from stay regarding the Property ☐ was ☐ was not granted.
 - 2. Case name: _____
Chapter: _____ Case number: _____
Date filed: _____ Date discharged: _____ Date dismissed: _____
Relief from stay regarding the Property ☐ was ☐ was not granted.
 - 3. Case name: _____
Chapter: _____ Case number: _____
Date filed: _____ Date discharged: _____ Date dismissed: _____
Relief from stay regarding the Property ☐ was ☐ was not granted.
- ☐ See attached continuation page for information about other bankruptcy cases affecting the Property.
- ☐ See attached continuation page for facts establishing that the multiple bankruptcy cases were part of a scheme to delay, hinder, or defraud creditors.

¹ The Debtor self-designated this case as a "single asset real estate" case in its voluntary chapter 11 bankruptcy petition filed on March 19, 2024. See Poupart Declaration, **Exhibit 22**, Chapter 11 Petition of Broadway Avenue Investments, LLC 2:24-bk-12081-VZ Dkt. 1 at ¶ 7.

19. ☐ Enforcement actions taken after the bankruptcy petition was filed are specified in the attached supplemental declaration(s).
- a. ☐ These actions were taken before Movant knew the bankruptcy petition had been filed, and Movant would have been entitled to relief from stay to proceed with these actions.
- b. ☐ Movant knew the bankruptcy case had been filed, but Movant previously obtained relief from stay to proceed with these enforcement actions in prior bankruptcy cases affecting the Property as set forth in Exhibit ____.
- c. ☐ For other facts justifying annulment, see attached continuation page.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

10/3/2024

Date

Bobby Khorshidi

Printed name



Signature

CONTINUATION PAGE

4.b. Legal Description of real property located at 737 South Broadway, Los Angeles, CA 90014:

EXHIBIT A

LEGAL DESCRIPTION OF LAND

THE LAND REFERRED TO IS SITUATED IN THE COUNTY OF LOS ANGELES, CITY OF LOS ANGELES, STATE OF CALIFORNIA, AND IS DESCRIBED AS FOLLOWS:

THAT PORTION OF BLOCK 25 OF THE HUBER TRACT, IN THE CITY OF LOS ANGELES, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 2, PAGE 280 OF MISCELLANEOUS RECORDS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY, DESCRIBED AS FOLLOWS:

BEGINNING AT THE INTERSECTION OF THE NORTHWESTERLY LINE OF BROADWAY, 80 FEET WIDE, WITH THE DIVIDING LINE ESTABLISHED BY AGREEMENT AND DEED BETWEEN THE LOS ANGELES TRUST COMPANY AND NIAGARA BUILDING COMPANY, RECORDED DECEMBER 11, 1908 IN BOOK 3568, PAGE 93 OF DEEDS, RECORDS OF SAID COUNTY, SAID INTERSECTION BEING DISTANT NORTH 37° 48' EAST ALONG SAID NORTHWESTERLY LINE, 180.47 FEET, MORE OR LESS, FROM THE NORTHERLY LINE OF 8TH STREET, 60 FEET WIDE, AS SHOWN ON MAP OF A RESUBDIVISION OF A PORTION OF BLOCK 25, HUBER TRACT, RECORDED IN BOOK 5, PAGE 15 OF MAPS, IN THE OFFICE OF SAID COUNTY RECORDER; THENCE NORTH 37° 48' EAST ALONG SAID NORTHWESTERLY LINE, 60 FEET, MORE OR LESS, TO THE MOST EASTERLY CORNER OF LOT 4 IN SAID BLOCK 25 OF HUBER TRACT; THENCE NORTH 52° 12' WEST ALONG THE NORTHEASTERLY LINE OF SAID LOT 4, A DISTANCE OF 165 FEET, MORE OR LESS, TO THE MOST NORTHERLY CORNER OF SAID LOT 4; THENCE SOUTH 37° 48' WEST ALONG THE NORTHWESTERLY LINE OF SAID LOT 4 AND OF LOT 3 OF BLOCK 25 OF SAID HUBER TRACT, 60 FEET, MORE OR LESS, TO SAID DIVIDING LINE; THENCE SOUTH 52° 12' EAST, ALONG SAID DIVIDING LINE, 165 FEET, MORE OR LESS, TO THE POINT OF BEGINNING.

APN: 5144-014-030

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:
1000 Wilshire Boulevard, Nineteenth Floor, Los Angeles, California 90017

A true and correct copy of the foregoing documents entitled: **NOTICE OF MOTION AND MOTION FOR RELIEF FROM THE AUTOMATIC STAY UNDER 11 U.S.C. § 362 (REAL PROPERTY); MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT OF MOTION FOR RELIEF FROM STAY; DECLARATION OF BOBBY KHORSHIDI IN SUPPORT OF MOTION FOR RELIEF FROM STAY; DECLARATION OF PAIGE S. POUPART IN SUPPORT OF MOTION FOR RELIEF FROM STAY; DECLARATION OF MICHAEL GERARD FLETCHER IN SUPPORT OF MOTION FOR RELIEF FROM STAY; REQUEST FOR JUDICIAL NOTICE IN SUPPORT OF MOTION FOR RELIEF FROM STAY** will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On **October 8, 2024**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

- Counsel to Party in Interest: Scott R Albrecht salbrecht@gsaattorneys.com, jackie.nguyen@sgsattorneys.com
- Counsel to KDM: Tanya Behnam tbehnam@polsinelli.com, tanyabehnam@gmail.com;ccripe@polsinelli.com;ladocketing@polsinelli.com
- Counsel to Party in Interest: Jacquelyn H Choi jacquelyn.choi@rimonlaw.com, docketingsupport@rimonlaw.com
- Counsel to Individual Debtors: Carol Chow Carol.Chow@saul.com, easter.santamaria@saul.com
- Counsel to Party in Interest: Robert F Conte robert.conte@usdoj.gov, caseview.ecf@usdoj.gov;usacac.tax@usdoj.gov
- Counsel to Individual Debtors: Ryan Coy ryan.coy@saul.com, hannah.richmond@saul.com
- Counsel to Party in Interest: Christopher Cramer secured@becket-lee.com
- Counsel to Individual Debtors: Turner Falk turner.falk@saul.com, tnfalk@recap.email
- Counsel to Archway: Michael G Fletcher mlfletcher@frandzel.com, sking@frandzel.com
- Counsel to Party in Interest: Todd S. Garan ch11ecf@aldridgepite.com, TSG@ecf.inforuptcy.com;tgaran@aldridgepite.com
- Counsel to Party in Interest: Richard Girgado rgirgado@counsel.lacounty.gov
- Counsel to Party in Interest: Jacqueline L James jjames@hrhlaw.com
- Trial Counsel to U.S. Trustee: Kelly L Morrison kelly.l.morrison@usdoj.gov
- Counsel to Party in Interest: Avi Edward Muhtar amuhtar@crowndandstonelaw.com
- Counsel to Archway: Bruce D Poltrock bpoltrock@frandzel.com, achase@frandzel.com
- Counsel to Individual Debtors: Zev Shechtman Zev.Shechtman@saul.com, zshechtman@ecf.inforuptcy.com;hannah.richmond@saul.com
- Counsel to Corporate Debtors: Derrick Talerico dtalerico@wztslaw.com, maraki@wztslaw.com,sfritz@wztslaw.com,admin@wztslaw.com
- United States Trustee (LA) ustpreion16.la.ecf@usdoj.gov
- Counsel to Archway: Gerrick Warrington gwarrington@frandzel.com, achase@frandzel.com
- Counsel to Party in Interest: Jennifer C Wong bknotice@mccarthyholthus.com, jwong@ecf.courtdrive.com

☐ Service information continued on attached page

2. SERVED BY UNITED STATES MAIL:

On (date) **October 8, 2024**, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

See attached service list.

☒ Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (date) **October 8, 2024**, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

Hon. Vincent Zurzolo (**Overnight Mail; Early Delivery**)
Edward R. Roybal Federal Building and Courthouse
255 E. Temple Street
Bin outside of Suite 1368
Los Angeles, CA 90012

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

10/8/2024
Date

Annette Chase
Printed Name

/s/ Annette Chase
Signature

2. SERVED BY UNITED STATES MAIL (unless indicated otherwise):

Debtor:

Broadway Avenue Investments, LLC
Attn: Officer, Manager, or Agent for Service of Process
264 S Oakhurst Dr
Beverly Hills, CA 90212

Jointly Administered Corporate Debtors:

Seaton Investments, LLC
Attn: Officer, Manager, or Agent for Service of Process
264 S Oakhurst Dr
Beverly Hills, CA 90212

Colyton Investments, LLC
Attn: Officer, Manager, or Agent for Service of Process
257 S Linden Dr
Beverly Hills, CA 90212

Negev Investments, LLC
Attn: Officer, Manager, or Agent for Service of Process
257 S. Linden Dr
Beverly Hills, CA 90212

SLA Investments, LLC
Attn: Officer, Manager, or Agent for Service of Process
264 S Oakhurst Dr
Beverly Hills, CA 90212

Jointly Administered Individual Debtors:

Susan Halevy
257 South Linden Drive
Beverly Hills, CA 90212

Daniel Halevy
8561 Horner Street
Los Angeles, CA 90035

Daniel Halevy
257 S. Linden Dr.
Beverly Hills, CA 90212-3704

Alan Gomperts
264 South Oakhurst Drive
Beverly Hills, CA 90212

**Counsel to Debtor and
Jointly Administered Corporate Debtors:**

Derrick Talerico
Weintraub Zolkin Talerico & Selth LLP
11766 Wilshire Blvd., Suite 730
Los Angeles, CA 90025

Counsel to Jointly Administered Individual Debtors:

Zev Shechtman
Carol Chow
Ryan Coy
Saul Ewing LLP
1888 Century Park East, Suite 1500
Los Angeles, CA 90067

Turner Falk
Saul Ewing LLP
1500 Market St, 38th Fl
Philadelphia, PA 19102

U.S. Trustee:

U.S. Trustee
United States Trustee (LA)
915 Wilshire Blvd, Suite 1850
Los Angeles, CA 90017

Kelly L Morrison
Office of the US Trustee
915 Wilshire Blvd., Ste. 1850
Los Angeles, CA 90017

Others, including Top 20 Largest Unsecured Creditors (Fed. R. Bankr. P. 1007(d)):

Harvest Small Business Finance, LLC
c/o Jacqueline L. James
Hemar, Rouso & Heald, LLP
15910 Ventura Blvd., 12th Floor
Encino, CA 91436-2829

Harvest Small Business Finance (SBA)
Attn: Officer, Manager, or Agent for Service of Process
24422 Avenida de la Carlota Ste 400
Laguna Hills, CA 92653-3634

Korth Direct Mortgage Inc.
c/o Tanya Benham
Polsinelli LLP
2049 Century Park East
Suite 2900
Los Angeles, CA 90067-3221

Korth Direct Mortgage Inc
Attn: Keith E. Henrich, Officer, Manager, and Agent for Service of Process
135 San Lorenzo Ave Ste 600
Miami, FL 33146-1875

First Foundation Bank
c/o Scott R. Albrecht, Esq.
19800 MacArthur Blvd., Suite 1000
Irvine, CA 92612-2433

First Foundation Bank (**By Certified Mail**)
Attn: Erica Dorsett Chief Legal Counsel
or Officer or Agent for Service of Process
18101 Von Karman Ave
Irvine, CA 92612

United States of America on behalf of
Internal Revenue Service
Attn: Robert F. Conte
300 N. Los Angeles Street, Room 7211
Los Angeles, CA 90012-3342

Wells Fargo Bank, N.A.
c/o McCarthy & Holthus, LLP
2763 Camino Del Rio South, Suite 100
San Diego, CA 92108-3708

AIRE Ancient Baths Los Angeles LLC
Attn: Officer, Manager, or Agent for Service of Process
88 Franklin St
New York, NY 10013-4085

Alta Fire Pro
Attn: Officer, Manager, or Agent for Service of Process
PO Box 7007
Mission Hills, CA 91346

Balboa Capital Corporation
Attn: Officer, Manager, or Agent for Service of Process
575 Anton Blvd
12th Floor
Costa Mesa, CA 92626-7169

CA Dept of Tax and Fee Admin
Account Info Group MIC29
PO Box 942879
Sacramento, CA 94279-0029

Director
California Department of Tax and Fee Administration
450 N Street, MIC: 104
Sacramento, CA 95814-0104

California Refrigeration & Supply
Attn: Officer, Manager, or Agent for Service of Process
1926 Glendon Ave, Apt 4
Los Angeles, CA 90025

Deborah Feldman Esq.
24611 Mulholland Hwy
Calabasas, CA 91302-2325

Deborah Feldman Esq.
12466 Marsh Pointe Rd
Sarasota, FL 34238-2115

Gomperts and Halevy Family Trust
Attn: Trustee or Agent for Service of Process
264 S Oakhurst Dr
Beverly Hills, CA 90212

Halevy Family Trust Dated September 6 2010
Attn: Trustee or Agent for Service of Process
257 S Linden Dr
Beverly Hills, CA 90212

Los Angeles Dept of Water and Power
Attn: Officer or Agent for Service of Process
PO Box 30808
Los Angeles, CA 90030-0808

Mark Berkowitz CPA
5850 Canoga Ave
Woodland Hills, CA 91367-6505

Pawnee Leasing Corporation
Attn: Officer or Agent for Service of Process
3801 Automation Way
Suite 207
Fort Collins, CO 80525

Polsinelli LLP
Attn: Garrick Vaderin Esq.
2049 Century Park E Ste 2900
Los Angeles, CA 90067-3221

RG Fire Inc
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8721 Laurel Canyon Blvd
Sun Valley, CA 91352

Sean Rudes and Monfrere
3891 Beverly Blvd #328
Los Angeles, CA 90004

Seapiper Inn Inc
Attn: Officer, Manager, or Agent for Service of Process
264 S Oakhurst Dr
Beverly Hills, CA 90212-3504

Silver Jeans
Attn Robert Silver
433 Colyton St Ste 201-203
Los Angeles, CA 90013-2210

Simply Electrical
Attn: Officer, Manager, or Agent for Service of Process
14101 S Budlong Ave
Gardena, CA 90247-2231

SoCalGas
Attn: Officer, Manager, or Agent for Service of Process
P.O. Box 30337
Los Angeles, CA 90030-0337

Urban Lime
Attn: Officer, Manager, or Agent for Service of Process
915 Mateo St
Los Angeles, CA 90021-1784

Wells Fargo Bank, N.A. **(By Certified Mail)**
Attn: Bankruptcy Department
MAC N9286-01Y
Default Document Processing
P.O. Box 1629
Minneapolis, MN 55440-1629

Wells Fargo Bank, N.A. **(By Certified Mail)**
Attn: Officer or Agent for Service of Process
101 N Phillips Ave
Sioux Falls, SD 57104

Wells Fargo Bank National West **(By Certified Mail)**
Attn: Officer or Agent for Service of Process
4455 Spring Mountain Rd
Las Vegas, NV 89102

Wells Fargo Bank, N.A.
c/o Christopher M. McDermott
Todd S. Garan
ALDRIDGE PITE, LLP
3333 Camino del Rio South, Suite 225
San Diego, CA 92108

WGW Sales Inc
Attn: Officer, Manager, or Agent for Service of Process
555 Logan Ave
Winnipeg, MB R3A 054
CANADA

802 Mateo Street LLC
Attn: Daniel Halevy or
Agent for Service of Process
802 Mateo St
Los Angeles, CA 90021

American Express
Attn: Officer or Agent for Service of Process
PO Box 001
Los Angeles, CA 90096-0001

American Express
Attn: Officer or Agent for Service of Process
PO Box 981535
El Paso, TX 79998-1535

Athas Capital Group Inc
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3990 Westerly Place Ste 240
Newport Beach, CA 92660

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Los Angeles, CA 90034

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Beverly Hills, CA 90212

Gabrielle Chavez
133 S Palm Dr #4
Beverly Hills, CA 90212

Nathan Halevy
133 S Palm Dr #5
Beverly Hills, CA 90212

Shmuel Levy
2247 S Canfield Ave
Los Angeles, CA 90034

Perla Segla
133 S Palm Dr #4
Beverly Hills, CA 90212

Shellpoint Mortgage Servicing
A division of Newrez LLC
c/o CSC—Lawyers Incorporating Service
2710 Gateway Oaks Dr Ste 150N
Sacramento, CA 95833

Wells Fargo Auto / Wells Fargo Bank
c/o CSC—Lawyers Incorporating Service
2710 Gateway Oaks Dr Ste 150N
Sacramento, CA 95833

Adam Willmouth, Ericka Ochoa
3538 Greenfield Ave
Los Angeles, CA 90034

Avi Muhtar
Crown & Stone Law, P.C.
407 N. Maple Drive Ground Floor
Beverly Hills, CA 90210-4272

Capital One
Attn: Officer, Manager, or Agent for Service of Process
PO Box 30285
Salt Lake City, UT 84130-0285

Commune Events Inc
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802 Mateo St
Los Angeles, CA 90021

Employment Development Department
Bankruptcy Group MIC 92E
P. O. Box 826880
Sacramento, CA 94280-0001

Franchise Tax Board
Bankruptcy Section MS A-340
PO Box 2952
Sacramento, CA 95812-2952

Internal Revenue Service
PO Box 7346
Philadelphia, PA 19101-7346

United States Attorney's Office
Federal Building, Room 7516
300 North Los Angeles Street
Los Angeles, CA 90012

United States Department of Justice
Ben Franklin Station
P. O. Box 683
Washington, DC 20044

Courtesy Copy to Archway
c/o Joshua Mogin Esq.
Thompson Coburn LLP
10100 Santa Monica Blvd Ste 500
Los Angeles, CA 90067

Los Angeles County Treasurer And Tax Collector
PO Box 54110
Los Angeles CA 90054-0110

Mordechai Miky Acoca
1926 Glendon Ave #4
Los Angeles, CA 90025

Sharon Gomperts
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Beverly Hills, CA 90210

Sienna Rose Inc
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Los Angeles, CA 90013

Southern California Edison
Attn: Officer, Manager, or Agent for Service of Process
1551 W San Bernardino Rd
Covina, CA 91722-3407

Southern California Gas
Centralized Correspondence
Attn: Officer, Manager, or Agent for Service of Process
PO Box 1626
Monterey Park, CA 91754-8626

US Small Business Administration
Attn: Officer or Agent for Service of Process
14925 Kingsport Rd
Fort Worth, TX 76155-2243

US Small Business Administration
Attn: Officer or Agent for Service of Process
409 3rd St SW
Washington, DC 20416-0005

U S Small Business Administration
Attn: Officer or Agent for Service of Process
312 N Spring St 5th Floor
Los Angeles Ca 90012-2678